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Trustee for Jazz Photo Corp. Liquidation Trust

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
HON. MORRIS STERN  
CASE NO. 03-26565 (MS)

Chapter 11

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In the Matter of:

JAZZ PHOTO CORP.,

Debtor.

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**NOTICE OF TRUSTEE'S MOTION FOR  
AN ORDER AUTHORIZING THE  
TRUSTEE TO ABANDON AND DESTROY  
THE DEBTOR'S BOOKS AND RECORDS**

**HEARING DATE AND TIME:**

May 11, 2009, 10:00 a.m.

**ORAL ARGUMENT WAIVED UNLESS  
OBJECTIONS TIMELY FILED**

TO: ALL PARTIES-IN-INTEREST ON THE  
ATTACHED SERVICE LIST

**PLEASE TAKE NOTICE** that on the 11th day of May, 2009, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, counsel for Edwin N. Ordway, Jr., Trustee for the Jazz Photo Corp. Liquidation Trust (the "Trustee"), shall move before the

Honorable Morris Stern, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for an Order Authorizing the Trustee to Abandon and Destroy the Debtor's Books and Records (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is also being submitted.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the "General Order") and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the "Supplemental Commentary") (the General Order, the Supplemental Commentary and the User's Manual for the Electronic Case Filing System can be found at [www.njb.uscourts.gov](http://www.njb.uscourts.gov), the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

**PLEASE TAKE FURTHER NOTICE** that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests oral argument on the return date of the Motion if any objections to the Motion are presented.

COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, P.A.  
Attorneys for Edwin N. Ordway, Jr.,  
Trustee for Jazz Photo Corp. Liquidation  
Trust

By /s/ Mark J. Politan  
Mark J. Politan

DATED: April 21, 2009

## SERVICE LIST

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